



January 8, 2015

Hon. Arlene R. Lindsay  
U.S. District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

RE: ROSENZWEIG v DIVERSIFIED ADJUSTMENT SERVICE, INC.  
13-CV-5563

Dear Magistrate Lindsay:

Please be advised that this office represents the defendant in the above-captioned matter. This letter is written in response to plaintiff's motion to compel, filed with the Court on January 5, 2015.

Since the date of the motion to compel, defendant has served its response to plaintiff's request for admissions. All that remains is defendant's responses to plaintiff's interrogatories and to plaintiff's request for production of documents.

There has been no real "meet and confer" preceding plaintiff's application to the Court. Had a "meet and confer" taken place, the undersigned would have informed plaintiff's counsel that there had been a change in personnel at the defendant corporation, including the hiring of a new in-house counsel. This occurred in mid-December and caused an interruption in communications between the undersigned and personnel at the defendant corporation.

Defendant anticipates being able to fully respond to the remaining discovery demands no later than January 15, 2015.

Thank you for your consideration.

Sincerely,

BARRON & NEWBURGER, P.C.

Arthur Sanders

as/cw